

Message

From: Mottley, Tanya [Mottley.Tanya@epa.gov]
Sent: 10/30/2017 1:03:53 PM
To: Morris, Jeff [Morris.Jeff@epa.gov]; Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Beck, Nancy [beck.nancy@epa.gov]; Baptist, Erik [baptist.erik@epa.gov]; Dourson, Michael [dourson.michael@epa.gov]; Grant, Brian [Grant.Brian@epa.gov]; Bolen, Derrick [bolen.derrick@epa.gov]
Subject: RE: New Chemicals Stakeholder input

No all "not likely" determinations need a SNUR. Only those for which a not likely determination is conditional (e.g., the PMN is amended with certain restrictions) would a SNUR be necessary. Since June 22, 2016, we've issued 103 not likely determinations because the chemical substance did not pose any risks.

Tanya

From: Morris, Jeff
Sent: Monday, October 30, 2017 8:25 AM
To: Bertrand, Charlotte ; Beck, Nancy ; Baptist, Erik ; Dourson, Michael ; Mottley, Tanya ; Grant, Brian ; Bolen, Derrick
Subject: RE: New Chemicals Stakeholder input

Just FYI, draft orders have always been sent pre-signed by EPA; the company always gets a call beforehand giving them a heads up that it's coming and letting them know that they can come back to us if they have questions or concerns.

To further refine the penultimate bullet, the concern is that EPA is interpreting "reasonably foreseen" too broadly.

From: Bertrand, Charlotte
Sent: Monday, October 30, 2017 8:17 AM
To: Beck, Nancy <Beck.Nancy@epa.gov>; Baptist, Erik <baptist.erik@epa.gov>; Dourson, Michael <dourson.michael@epa.gov>; Morris, Jeff <Morris.Jeff@epa.gov>; Mottley, Tanya <Mottley.Tanya@epa.gov>; Grant, Brian <Grant.Brian@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>
Subject: RE: New Chemicals Stakeholder input

One addition

From: Beck, Nancy
Sent: Friday, October 27, 2017 5:59 PM
To: Baptist, Erik <baptist.erik@epa.gov>; Dourson, Michael <dourson.michael@epa.gov>; Morris, Jeff <Morris.Jeff@epa.gov>; Mottley, Tanya <Mottley.Tanya@epa.gov>; Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>; Grant, Brian <Grant.Brian@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>
Subject: New Chemicals Stakeholder input

INTERNAL DELIBERATIVE

Please add/ edit as needed. I'm sure I'm missing some topics.
Main things we've heard from submitters:

- Timeliness is critical
- New approach limits getting safer chemicals to market so people are still using older products
- Discontent with number of consent orders, and draft consent orders are sent 'pre-signed' by EPA

- Downstream users (particularly for personal care products) are reluctant to use any materials that have recordkeeping requirements for downstream users. When manufacturers learn a new chemical will get a SNUR or Consent Order, they often withdraw the PMN as they know there will be no market
- Chemicals with any type of regulatory flag are a concern
- May present findings are a concern-particularly when its for a hypothetical future use and not the known/intended use
- Not every not likely determination should need a SNUR

Nancy

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Ex. 6 Personal Privacy (PP)

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